

IN THE
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

SHARNE C. FRANCIS)	Plaintiff,
)	
v.)	Civil Action No.: 3:21-cv-28
)	
)	
BALJINDER SINGH)	
AND)	
CST TRANSPORT, LLC)	Defendants.

NOTICE OF REMOVAL

COME NOW the Defendants, Baljinder Singh and CST Transport, LLC, by counsel, pursuant to 28 U.S.C. §1332 and 1441 et. seq. and state for their grounds for removal as follows:

1. The Plaintiff in this matter, Sharne C. Francis, was at all times relevant to this cause of action and at the time of filing and any attempted service a citizen of the Commonwealth of Virginia and upon information and belief resides in or around the County of Henrico. Plaintiff Francis is currently a citizen of the Commonwealth of Virginia.

2. The Defendant, Baljinder Singh was at all times relevant to this cause of action and at the time of filing and any attempted service a citizen of the State of Colorado, residing in the County of Adams. Defendant Baljinder Singh is currently a citizen of the state of Colorado, residing in the County of Adams.

3. The Defendant CST Transport, LLC, was at all times relevant to this cause of action and at the time of filing and any attempted service a citizen of the State of Indiana as it is a limited liability corporation organized under the law of Indiana and has its principal place of

business in Indiana. The Defendant CST Transport, LLC is currently a citizen of the State of Indiana.

4. This lawsuit was filed in the Circuit Court for the County of Henrico on December 23, 2020. The Defendants have had notice of this lawsuit for less than thirty (30) days.

5. The amount in controversy exceeds the sum of Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs, Plaintiff's *ad damnum* being the sum of Three Hundred and Fifty Thousand Dollars and Zero Cents, (\$350,000.00), plus costs and pre and post judgment interest.

6. This Court has jurisdiction over this action by reason of the amount in controversy and diversity of the parties under 28 U.S.C. §1332, 1441 and 1446.

7. Venue is proper in the Eastern District of Virginia, Richmond Division, as this matter arises out of an automobile accident that occurred in the County of Henrico, Virginia.

8. The Defendants consent to the removal of this case. The proper Defendants are diverse from the Plaintiff.

WHEREFORE the Defendants, Baljinder Singh and CST Transport, LLC, by counsel, respectfully request that this Court accept jurisdiction of this cause of action from the Circuit Court of the County of Henrico, Virginia.

BALJINDER SINGH
And
CST TRANSPORT, LLC

By Counsel

_____/s/_____, p.d.

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Counsel for Defendant Baljinder Singh and CST Transport, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on the 19th day of January, 2021, I will email the foregoing to counsel listed below and I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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